

JONES DAY

51 LOUISIANA AVENUE, N.W. • WASHINGTON, D.C. 20001.2113
TELEPHONE: +1.202.879.3939 • FACSIMILE: +1.202.626.1700

DIRECT NUMBER: (202) 879-5572
SCOTTREAU@JONESDAY.COM

October 15, 2019

VIA ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: Class Certification Discovery Status and Briefing Schedule in *Estate of John P. O'Neill, Sr. v. Al Baraka Inv. & Dev. Corp.*, 04-cv-1923 (S.D.N.Y.) (GBD) (SN)

Dear Judge Netburn:

Pursuant to the Court's June 10, 2019 Order (ECF No. 4582), Defendants Dubai Islamic Bank, World Assembly of Muslim Youth, Muslim World League, International Islamic Relief Organization, and Yassin Kadi, in consultation with the Plaintiffs in *Estate of John P. O'Neill, Sr., v. Al Baraka Inv. & Dev. Corp.*, 04-cv-1923, by their undersigned counsel, respectfully submit this joint status letter regarding class certification discovery and briefing.

I. Status of Class Discovery

On September 13, 2019, Defendants served limited interrogatory requests on the named class representatives. Plaintiffs provided their interrogatory responses on October 14, 2019.

The parties have also scheduled depositions for the named class representatives. The depositions of the three class representatives who are individuals (as opposed to estates) shall begin on October 28, 2019, and continue from day to day as necessary until completed.

II. Proposed Class Certification Briefing Schedule

The parties have also conferred regarding a briefing schedule for class certification. The parties hope to have the issue of class certification briefed and decided by the Court prior to the final resolution of any dispositive motions so that the Parties will know whether the putative class

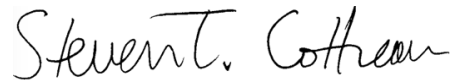
JONES DAY

October 15, 2019
Page 2

members will be bound by the resolution of those motions. Accordingly, the parties respectfully recommend that the Court adopt the following schedule:

1. Plaintiffs' motion for class certification: On or before January 31, 2020.
2. Defendants' opposition brief(s) (if any): On or before March 31, 2020.
3. Plaintiffs' reply brief (if any): 30 days after Defendants file their briefs in opposition to class certification.

Sincerely,

A handwritten signature in black ink, reading "Steven T. Cottreau". The signature is written in a cursive, flowing style.

Steven T. Cottreau

cc: Counsel of Record (via ECF)